PX-518A

Case Clip(s) Detailed Report
Sunday, January 09, 2011, 1:33:21 PM

518-A

0_W3301

📁 **Oliver, Kristy (Vol. 01) - 03/11/2010**   **1 CLIP (RUNNING 00:57:13.200)**

🎬 Could you please state your name for the ...

| **KOEDIT** | **57 SEGMENTS (RUNNING 00:57:13.200)** | ⬛ |

1. PAGE 6:18 TO 6:22 (RUNNING 00:00:07.000)

```
18              Q     Could you please state your name for the
19        record.
20              A     Kristy Oliver.
21              Q     And who are you employed by?
22              A     Blount Memorial Hospital.
```

2. PAGE 8:24 TO 9:04 (RUNNING 00:00:18.200)

```
24              Q     -- could you take a moment, please, to
25        review those 11-numbered topics on Pages 10 and 11,
00009:01  and the question I'll have once you've reviewed them
02        is whether you are prepared to testify today on
03        behalf of Blount Memorial Hospital regarding each of
04        these topics?
```

3. PAGE 9:05 TO 9:07 (RUNNING 00:00:07.800)

```
05              A     Yes, I am.  The document does refer to
06        Punchout, and we do not own or license or use
07        Punchout.
```

4. PAGE 10:06 TO 10:18 (RUNNING 00:00:30.300)

```
06              Q     What is your current job title at Blount?
07              A     I'm Director of Materials Management and
08        Home Medical Equipment.
09              Q     And Home Medical Equipment?
10              A     Yes.
11              Q     And how long have you had that title?
12              A     Five years.  I've been over materials for
13        five years and home medical equipment for two.
14              Q     What are the responsibilities of your
15        job?
16              A     Being Director of Materials Management,
17        I'm over purchasing, receiving, inventory control,
18        print shop and OR materials coordinator as well.
```

5. PAGE 11:14 TO 12:12 (RUNNING 00:01:02.500)

```
14              Q     What software does Blount currently
15        license from Lawson?
16              A     We use -- I don't -- I'm not sure I -- I
17        mean, we -- our Human Resources Department, our
18        Accounting and Finance Department and Materials
19        Management use the suites of Lawson.
20              Q     Okay.  And what suite does the Materials
21        Management group use?
22              A     The procurement suite with the
23        Requisitions Self-Service.
24              Q     Okay.  What procurement modules are
25        included within the supply chain management or
00012:01  procurement suite?  For example, does that include
```

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```
02        inventory control?
03              A     Yes.
04              Q     Does that also -- does that also include
05        the requisitions module?
06              A     Yes.
07              Q     Does it include purchase order module?
08              A     Yes.
09              Q     And you mentioned it also includes
10        Requisitions Self-Service?
11              A     Yes.  And we also use Contract Management
12        as well.
```

6. PAGE 12:13 TO 12:22 (RUNNING 00:00:34.800)

```
13              Q     Does Blount license the EDI module?
14              A     Our EDI transactions -- we have a
15        contract with GHX, Global Healthcare Exchange, and
16        they maintain our EDI transactions via Lawson.
17              Q     Do you license any software from Lawson
18        that is related to the EDI transactions?
19              A     No.
20              Q     Does Blount license Procurement Punchout
21        from Lawson?
22              A     No.
```

7. PAGE 12:23 TO 13:08 (RUNNING 00:00:28.200)

```
23              Q     No?  When -- when was the first time when
24        Blount licensed -- licensed the Lawson Software?
25              A     We began implementing the system in June
00013:01        of 2008, and we went live with the production module
02        January 1st, 2009.
03              Q     And prior to January 1st, 2009, what
04        software, if any, was Blount using for materials
05        management?
06              A     Infinium.
07              Q     And what's the company that supplies the
08        Infinium Software?
```

8. PAGE 13:09 TO 14:08 (RUNNING 00:01:16.100)

```
09              A     It's called Infinium.
10              Q     Why was the decision made to switch from
11        Infinium to Lawson Software for materials management?
12              A     Infinium -- we -- it did not provide us
13        with a way to maintain an Item Master List.
14                    It also -- we had double entry -- our
15        purchasing agents had to key in requisitions as they
16        came down.  There was no interface that took us
17        from -- we went paperless, and they had to key in
18        those requisitions direct into Infinium, and Lawson
19        gave us the capability for requisitioners to be able
20        to put their order in and then the purchase order be
21        generated automatically based on that requisition,
22        and it reduced the keying time for our purchasing
23        agents, and it allowed us to use a contract
24        management system.
25                    Those are probably our top three reasons
00014:01        to switch on the procurement side.
```

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```
02              Q      Did Lawson generate a Request for
03       Proposal when it was considering switching from the
04       Infinium system?
05              A      Yes.
06              Q      And what companies was the Request for
07       Proposal issued to?
08              A      McKesson, Cerner PeopleSoft and Lawson.
```

9. PAGE 14:23 TO 16:08 (RUNNING 00:01:36.700)

```
23              Q      Were you responsible for compiling the
24       Request for Proposal?
25              A      There was a team that put in what needs
00015:01       we would have in the software and then our IT
02       department compiled the RFP.
03              Q      Were you involved in generating a list of
04       the functionality that you would need?
05              A      Yes.
06              Q      And what specific functionality were you
07       interested in having in software that you would use
08       for procurement?
09              A      We wanted to be paperless.  We wanted
10       inventory control to auto generate the orders based
11       on what had been issued and received in the -- in our
12       inventory.  We wanted an Item Master List to help
13       control costs, and we wanted a contract management
14       system to help us manage our contracts.
15              Q      When you say an Item Master List, what
16       are you referring to?
17              A      Items that -- that people order
18       frequently on a frequent basis for them to be able to
19       go in.  They don't have to remember the vendor, the
20       unit of measure that we need to order the item by.
21       All that information is stored for them in Lawson,
22       and they can go in there and search by several
23       different things through the search catalog-in
24       Requisitions Self-Service and add those items to a
25       shopping cart and checkout and then that rolls down
00016:01       to the purchasing folks, and they generate the
02       purchase orders and send out the orders.
03              Q      Now you're talking about the Item Master
04       List that's currently -- you're referring to the Item
05       Master List that's currently in the Lawson Software?
06              A      Yes.
07              Q      That's used by Blount today?
08              A      Yes.
```

10. PAGE 17:04 TO 18:03 (RUNNING 00:01:44.000)

```
04              Q      Do you know approximately how many items
05       are currently in the Item Master?
06              A      I think about 8,000.
07              Q      And do you know approximately how many
08       vendors are in the Item Master?
09              A      I do not.
10              Q      Can you give me some examples of the
11       largest vendors that Blount uses that are in the Item
12       Master?
```

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```
13              A      Seneca that is our med search -- our main
14      med search distributor that we -- we get the majority
15      of our medical supplies through.  Cardinal is a large
16      vendor that's also in Lawson.  The divisions of
17      Johnson & Johnson, which would be Ethicon, Cordis.
18              Q      What type of information about each item
19      is contained in the Item Master?
20              A      You have -- the ANSI format unit of
21      measure is in there, a description of the item, the
22      manufacturer item number if there's a separate vendor
23      item number, the manufacturer description, and
24      there's a -- we assign a purchasing class and an
25      inventory class if that's applicable as well.  That's
00018:01      stored in there, and the cost of the item, and how
02      many is in each unit of measure; for example, six in
03      a box or ten boxes in a case.
```

11. PAGE 18:04 TO 18:09 (RUNNING 00:00:11.000)

```
04              Q      Do any of the items have images
05      associated with them?
06              A      Not at this time.
07              Q      Do you intend to eventually include
08      images in the Item Master?
09              A      Hopefully, yes.
```

12. PAGE 19:08 TO 19:22 (RUNNING 00:00:51.900)

```
08              Q      Now, does the system as it's configured
09      at Blount, the Lawson Requisitions Self-Service
10      system, include a functionality that allows a user at
11      Blount to generate one or more purchase orders from a
12      single requisition?
13              A      Yes.
14              Q      Does it also include a functionality that
15      allows a user to select and search for particular
16      items based on the item description within --
17              A      Yes.  If they go into the search catalog,
18      there's -- you can do an express search, which is
19      just by the item number only.  You have to go to the
20      search catalog to be able to search based on either
21      manufacturer item, description or anything like that.
22      That is more of an advanced search.
```

13. PAGE 19:23 TO 20:07 (RUNNING 00:00:24.600)

```
23              Q      And within the advanced search
24      functionality, is there the capability for a user at
25      Blount to search both by manufacturer name and an
00020:01      item description?
02              A      No.  It would have to be one or the
03      other.  Not at the same time.
04              Q      Does it have, like, a bouillon capability
05      of putting in a manufacturer name and then a space
06      and then an item description so that it searches --
07              A      Not that I'm aware of.
```

14. PAGE 22:25 TO 23:02 (RUNNING 00:00:05.700)

```
25              Q      Okay.  Does -- are there -- are you
```

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00023:01        familiar with the term UNSPSC?
      02              A     No.
```

15. PAGE 23:03 TO 26:16 (RUNNING 00:03:46.600)

```
      03              Q     Is there the capability for a user at
      04        Blount to search by category?
      05              A     Our purchasing classes and inventory
      06        classes -- how we have it categorized per my -- the
      07        example I gave with catheters, every catheter that we
      08        have in the Item Master List has a purchasing class
      09        of c-a-t-h for cath, and they can search based on
      10        that.  Gloves are in there as gloves.  Laboratory
      11        item are in there as lab.  Urology items are in there
      12        as u-r-o.
      13              Q     Okay.  So you can search by category in
      14        the sense that if you type U --
      15              A     Our own purchasing classes that we set up
      16        they are unique to us.
      17              Q     You created your own custom made
      18        categories --
      19              A     Yes.
      20              Q     -- that would allow a user to search by
      21        category?
      22              A     Yes.
      23              Q     And what kind of assistance did Lawson
      24        provide to Blount in creating the Item Master and all
      25        the information in it?
00024:01              A     They simply provided us a template
      02        spreadsheet with the fields that Lawson would
      03        require, and then we manually built all our items
      04        during the implementation phase and then provided the
      05        spreadsheet to Lawson, and they uploaded it or
      06        downloaded.
      07              Q     When you say that they -- they uploaded
      08        it, you mean Lawson uploaded it?
      09              A     Yes.  We had a consultant on-site during
      10        the implementation phase during particular times
      11        during implementation, and we would provide her with
      12        the information she needed, and we would send her the
      13        spreadsheet, and then she would put it in the system.
      14              Q     Was that -- that was a consultant who was
      15        working here at Blount?
      16              A     Yes, and she was an employee of Lawson.
      17              Q     What was her name?
      18              A     Katrina Rice.
      19              Q     And how long was Ms. Rice on-site here at
      20        Blount?
      21              A     Off and on for a seven-month period.  She
      22        would come and be here for, you know, two weeks, and
      23        then be gone for two weeks while we would work on the
      24        categories that she was needing us to finish, and
      25        then she would come back.
00025:01                    So it was sporadic over a seven-month
      02        period.
      03              Q     Was that in the second half of 2008?
      04              A     Yes.  That would have been from July 2008
```

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```
05      through January 2009.
06            Q      And can you describe for me at a high
07      level the types of activities or assistance that
08      Ms. Rice was providing while she was here at Blount?
09            A      Mostly providing the templates, and if we
10      had questions as to what the field they were
11      needing -- you know, for example, if we didn't
12      understand what the manufacturer number was, she
13      would explain to us the type of data that she was
14      needing in the spreadsheet to make the Item Master
15      List accurate.
16                  She helped in testing and training as
17      well.
18            Q      What kind of assistance did she provide
19      with testing?
20            A      They provided us generic test scripts
21      to -- so that we could get the test system set up and
22      train as well.
23            Q      Did Lawson provide Blount with scripts on
24      how to use Requisitions Self-Service?
25            A      Yes.
00026:01            Q      And did Lawson provide Blount with
02      scripts on how to create a requisition for a
03      particular item within Requisitions Self-Service?
04            A      Not a particular item, but how you would
05      do it, and then we would pick one of the items we had
06      set up, but they did not specify an item in their
07      test script.  It could be whatever item we chose to
08      pick.
09            Q      Did the test scripts provided by Lawson
10      include information on how to search within
11      Requisitions Self-Service?
12            A      Yes.
13            Q      Did the test scripts provided by Lawson
14      to Blount include information on how to generate
15      purchase orders?
16            A      Yes.
```

16.   PAGE 26:17 TO 27:03 (RUNNING 00:00:40.000)

```
17            Q      Did the test scripts provided by Lawson
18      include information on searching for vendors within
19      the Item Master?
20            A      Not -- not -- not searching for vendors
21      within the Item Master, no, but searching for
22      vendors -- if you were at the Requisitions
23      Self-Service, you were doing a special item and you
24      needed to find a vendor that you were wanting to
25      order an item that wasn't in the Item Master List --
00027:01      you were ordering that as a special item -- the test
02      scripts explained how to find a vendor when you were
03      ordering something not in the Item Master List.
```

17.   PAGE 27:04 TO 28:04 (RUNNING 00:01:06.500)

```
04            Q      You did mention earlier that -- you
05      testified earlier that Ms. Rice actually loaded in
06      items into the Item Master; is that correct?
```

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```
         07                 A    Yes, sir.  Sorry.  I nodded.
         08                 Q    Thank you.
         09                      Now, can you describe for me exactly what
                    types of items she loaded into the Item Master?  Was
         10
         11         it all the information that was in the Item Master?
         12                 A    Yes.  Yes, all of our inventory and
         13         non-inventory items that we provided to her via the
         14         spreadsheet.
         15                 Q    All of that information was loaded by
         16         Ms. Rice into the Item Master that Blount uses?
         17                 A    We have -- since gone live, we have added
         18         items ourselves, but during the implementation phase
         19         the original Item Master List was set up, she did --
         20         she loaded those items, and since then, we load our
         21         own.
         22                 Q    So you went live, was it, January 1st,
         23         2009?
         24                 A    Yes.
         25                 Q    So the day that the Item Master and
  00028:01         Requisitions Self-Service went live at Blount that
         02         Item Master and all the information in it had been
         03         loaded by Ms. Rice for Blount?
         04                 A    Yes.
```

18. PAGE 29:12 TO 29:19 (RUNNING 00:00:18.900)

```
         12                 Q    Okay.  Now, who makes the decisions about
         13         what non-stock items to include in the Item Master?
         14                 A    I do, in addition to our contract and
         15         license purchasing manager based on the frequency of
         16         ordering.
         17                      If we see an item is being ordered
         18         frequently, we try to get that item added into our
         19         Item Master List.
```

19. PAGE 34:06 TO 34:08 (RUNNING 00:00:10.000)

```
         06                 Q    Can users at Blount create requisitions
         07         through the requisitions module?
         08                 A    No.
```

20. PAGE 34:09 TO 34:15 (RUNNING 00:00:13.000)

```
         09                 Q    So the only way that a user at Blount can
         10         create a requisition is through the Requisitions
         11         Self-Service module?
         12                 A    Yes.  The only people that have access to
         13         the standard Requisition module is the purchasing
         14         agent, but we never use it, but we do have access to
         15         it if needed.
```

21. PAGE 35:12 TO 35:15 (RUNNING 00:00:12.900)

```
         12                 Q    Does the Item Master that Blount
         13         maintains include generally equivalent items like,
         14         for example, similar catheters that are available
         15         from different vendors?
```

0_W3301

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22. PAGE 35:18 TO 35:18 (RUNNING 00:00:00.500)

```
18                    THE WITNESS:  Yes.
```

23. PAGE 36:20 TO 37:11 (RUNNING 00:00:50.000)

```
20              Q     And you mentioned that you viewed demos
21        of the system?
22              A     Yes.
23              Q     In what form was that demo provided to
24        you from Lawson?
25              A     They came on-site and showed us the demo
00037:01        of the system.  I assume they were logged in via the
02        Internet to show us test demo systems.
03              Q     After you informed Lawson that you were
04        interested in purchasing their software, what was the
05        next step in the process of actually signing a final
06        contract?
07              A     Contract negotiation for pricing, legal
08        review of the verbiage in the contract, and then
09        establishing a timeline for the implementation and
10        determining the Lawson consultants that would be
11        coming on-site.
```

24. PAGE 37:23 TO 38:24 (RUNNING 00:01:18.600)

```
23              Q     Who was Ms. Rice's primary contact here
24        at Blount?  Who was she working with at Blount?
25              A     Me.
00038:01              Q     And what kind of interaction did you have
02        with her?
03                    In other words, what kind of work were
04        you guys involved with during those seven months that
05        she was present here?
06              A     Going back to the spreadsheets that I
07        referred to earlier, making sure that the data was
08        loaded correctly in those and that, you know, we were
09        meeting the needs that -- and providing the
10        information for the required fields that Lawson has
11        and then testing once that information was loaded in
12        the system.
13              Q     In addition to licensing software from
14        Lawson, did Blount also agree to any sort of
15        maintenance or sign a contract so that Lawson would
16        provide maintenance for that software?
17              A     Yes.
18              Q     And what kind of maintenance does Lawson
19        provide to Blount for the software it licensed?
20              A     They provide technical support.  They
21        also provide -- they will log-in to our servers and
22        load our patches and help -- you know, help with any
23        problems that we have through our service and
24        maintenance agreement with them.
```

25. PAGE 38:25 TO 39:10 (RUNNING 00:00:29.000)

```
25              Q     Do you have any assistance on-site from
00039:01        Lawson consultants?
02              A     No.
```

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```
03              Q     And that --
04              A     Not currently.
05              Q     Did that end after Ms. Rice left?
06              A     Yes.  The -- our human resources suite
07      have had -- they have changed a couple of benefits
08      plans and have had a consultant on-site, I think, a
09      time or two since we went live due to a change in a
10      benefit package that required a custom calc.
```

26. PAGE 40:06 TO 41:23 (RUNNING 00:02:04.300)

```
06              Q     The court reporter has now handed you
07      what has been marked as Blount Exhibit 2.
```

📄 **PX0225-0001 - PX0225-0001**

```
08                    It's a document entitled Requisitions
09      Self-Service Lawson training.  Could you please take
10      a moment to review the document.
11                    MR. STRAPP:  And for the record,
12                this has Bates Stamps on it that start
13                with B5 and runs through B77.
14      BY MR. STRAPP:
15              Q     Are you familiar with this document?
16              A     Yes.
17              Q     Could you, please, describe to me what it
18      is.
19              A     Yes.  The first part, the Requisitions
20      Self-Service training, is the screens.  These were
21      developed by myself and my purchasing manager, Rob
22      Storey.
23                    We just did screen shots of Lawson.  We
24      developed this training packet on our own, and it was
25      used to train our nurses and our requisitioners on
00041:01      how to order through Lawson.
02                    The back part are the test scripts that
03      were provided by Lawson that actually they used to
04      train the Super Users.  Which for my department, was
05      myself, the purchasing agents, our receiving clerks,
06      my inventory control person and my assistant
07      director.  We used the Lawson produced test scripts,
08      and then to train the regular users, we made our own,
09      which is the front part of this packet.
10                    So it's actually a combination of two
11      things here.
12              Q     So the first half of this document it
13      looks like these are power point slides; is that
14      correct?
15              A     Yes.
16              Q     And those are slides that you created
17      with Rob Storey?
18              A     Yes.
19              Q     And then the second portion of this
20      document that are -- these documents with charts and
21      tables that have test scripts those were created by
22      Lawson?
23              A     Yes.
```

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27.   PAGE 42:07 TO 43:15 (RUNNING 00:01:26.000)

```
         07                Q     And who trained you on those test scripts
         08          that were provided by Lawson?
         09                A     Katrina.
         10                Q     And she also trained the other Super
         11          Users you called them?
         12                A     Yes.
         13                Q     Are they called Super Users because they
         14          are frequent users of the system?
         15                A     Yes, and we trained the trainer.  She
         16          trained us, and we trained everybody else.
         17                Q     So she's the original trainer?
         18                A     Yes.
         19                Q     She trains you, and then you train --
         20                A     All 700 through -- all the rest of them.
         21                Q     How many people have access to the
         22          Requisitions Self-Service system at Blount?
         23                A     I think we have -- we have about 600
         24          approved requisition users.
         25                Q     So I assume that not all those people are
   00043:01          in the Materials Management group?
         02                A     No.
         03                Q     What other groups of employees at Blount
         04          have access to Requisitions Self-Service?
         05                A     Each department will have anywhere from
         06          one to, you know, ten people even -- that have access
         07          to do ordering for their area.  All the nurses -- I
         08          say that.  Most of the nurses have access to be able
         09          to go in and order items.  Some of our nursing
         10          requisitioners can just order from our inventory
         11          storeroom.  They don't have access to order any
         12          non-stock items direct or any special items that
         13          aren't in the Item Master List.  That depends on how
         14          their record is set up in Lawson for what they --
         15          their -- they can do.
```

28. PAGE 44:15 TO 44:21 (RUNNING 00:00:21.800)

```
         15                Q     Okay.  Could you turn, please, to B-17.
```

📄 **PX0225-0013 - PX0225-0013**   ███████████████

```
         16          Do you see there's a document entitled here scenario
         17          log for configuration acceptance testing?
         18                A     Yes.
         19                Q     And handwritten at the bottom it says
         20          Lawson test scripts?
         21                A     Yes.
```

29. PAGE 46:20 TO 47:04 (RUNNING 00:00:17.000)

```
         20                Q     Okay.  Now the create requisition through
         21          RSS is that a script that describes how to create
         22          requisitions through Requisitions Self-Service?
         23                A     Yes.
         24                Q     And that's a test script that was
         25          provided by Lawson to Blount?
   00047:01                A     Yes.
```

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```
            02              Q      And Katrina rice trained you on that test
            03      script?
            04              A      Yes.
```

30. PAGE 47:05 TO 47:12 (RUNNING 00:00:29.000)

```
            05              Q      And then -- I'm just taking a look here.
            06      Are there any other scripts that you see listed here
            07      that relate to creating requisitions through
            08      Requisitions Self-Service?
            09              A      No, just there were the three.  The
            10      one -- the general one and then one for inventory and
            11      one for special in service that was listed under the
            12      same section you were referring to.
```

31. PAGE 47:13 TO 49:25 (RUNNING 00:03:03.300)

```
            13              Q      Okay.  If you take a look about
            14      two-thirds of the way down this page, there is --
            15      there's a section on the left column that's entitled
            16      purchase order vendor agreement.  Do you see that?  I
            17      know it's small type.
            18              A      Yes.
            19              Q      And then there are three scripts listed
            20      in that category?
            21              A      Yes.
            22              Q      Can you describe for me what those
            23      scripts relate to?
            24              A      That is for contracts, when we load a
            25      contract, the modules PO 25 in the procurement side,
  00048:01      and that would allow us to -- if we have a contract
            02      with a particular vendor where the price for the
            03      items are $50 a box, we can load that contract in,
            04      tie it to that item that's in our Item Master List.
            05      It pulls from the contract price when we produce a
            06      purchase order, and it will also require that the
            07      invoice comes in and matches that price in order for
            08      that vendor to be paid.
            09              Q      So once an individual at Blount or --
            10      once someone -- once someone at Blount loads in the
            11      purchase order vendor agreement contract, all of the
            12      information associated with each item from the vendor
            13      in the contract automatically gets pulled into the
            14      Item Master?
            15              A      Yes.  We have to set it up.  What we do
            16      is make a spreadsheet for all the items that may be
            17      under this contract, and there are certain fields
            18      that are required, and then through Microsoft
            19      add-ins, we attach that contract to each of the items
            20      that it's associated with.
            21              Q      Did Ms. Rice from Lawson assist Blount in
            22      adding in the purchase order vendor agreement
            23      contracts before the system went live in 2009?
            24              A      Only for a couple.  She showed us how to,
            25      and that was one of the last things we did.  We only
  00049:01      had a couple of contracts loaded in at the time we
            02      went live, and what has been loaded in since has been
            03      done by us.
```

0_W3301

```
04              Q    Okay.  So -- and the system that went
05        live as of January 1st, 2009, the vendor agreement
06        contracts and the information associated with those
07        contracts, had been loaded by Ms. Rice?
08              A    Yes, but there were only, like, I think
09        maybe two vendors, and I don't know which ones those
10        were.
11              Q    Okay.  And if you go to the top of this
12        document here, there's a column on the left -- a
13        description on the left, the second one down, it says
14        inventory Item Master, and there is a test script
15        that is called create new item.  Do you see that?
16              A    Yes.
17              Q    What does that script involve?
18              A    That's where -- that's one of the first
19        places you would go to set an item up in the item
20        Master List and whether or not you link it to
21        inventory or it's a direct.
22              Q    So that's a test script that Lawson
23        provided to Blount that describes how to add a new
24        item to the Item Master?
25              A    Yes.
```

32. PAGE 50:14 TO 51:04 (RUNNING 00:00:37.200)

```
14              Q    Okay.  Let's take a look at page B-25.
```

📄 **PX0225-0021 - PX0225-0021**

```
15        It's the script entitled purchase order vendor
16        agreement, and it says prepared by Lawson.
17              A    Oh, it -- that's -- that's the contract
18        piece, too.  That's where you would load a contract
19        in.
20              Q    So this was a script that was provided by
21        Lawson that describes how to add in a vendor
22        contract?
23              A    Yes.
24              Q    And were you trained on this script by
25        Ms. Rice?
00051:01              A    My contract analyst was.  I personally
02        was not.
03              Q    Who is your contract analyst?
04              A    Cheryl Smith.
```

33. PAGE 51:05 TO 51:16 (RUNNING 00:00:30.100)

```
05              Q    Okay.  Has Cheryl Smith been responsible
06        for loading vendor contracts in since the time that
07        Ms. Rice left?
08              A    Yes.
09              Q    And approximately how many vendor
10        contracts have been loaded into the system?
11              A    Not very many.  I'm going to say less
12        than 30.
13              Q    When you're adding in a vendor contract,
14        is the information from that vendor -- all the items
15        associated with that vendor are non-stock items?
```

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0_W3301

```
        16              A    Not necessarily.
```

34. PAGE 51:17 TO 52:09 (RUNNING 00:00:50.000)

```
        17              Q    Okay.  Let's turn to page B-41.  What is
```

📄 **PX0225-0037 - PX0225-0037**   ⬛

```
        18      this script here?
        19              A    This is one of the first steps in setting
        20      up a new item in the Item Master List.  It's -- it's
        21      where you put in your manufacturer code, your -- the
        22      manufacturer division; for example, if it was Johnson
        23      & Johnson would be the manufacturer and the division
        24      could be Ethicon.  This is also -- there's a tab
        25      there where you set up our inventory class and
   00052:01      purchasing class as well.
        02              So it's one of the first screens in
        03      setting up an item.
        04              Q    And this is a script that was provided by
        05      Lawson as well?
        06              A    Yes.
        07              Q    Were you trained on how to use this
        08      script by Katrina?
        09              A    Yes.
```

35. PAGE 52:10 TO 53:05 (RUNNING 00:01:38.000)

```
        10      (Blount Deposition Exhibit No. 3 was marked for the
        11      record.)
        12       BY MR. STRAPP:
        13              Q    You've been handed what has now been
        14      marked as Blount Exhibit 3.
```

📄 **PX0226-0001 - PX0226-0001**   ⬛

```
        15              Could you please take a moment to review
        16      this document.
        17              Can you tell me what this -- first, are
        18      you familiar with this document?
        19              A    I haven't looked at it in a long time,
        20      but, yes, I'm aware of what it is.
        21              Q    Could you describe to me what it is,
        22      please.
        23              A    Yes.  It was Lawson's response to Blount
        24      Memorial's Request for Proposal for an ERP system.
        25              Q    And you were a part of the team that
   00053:01      evaluated their proposal?
        02              A    Yes.
        03              Q    If you take a look at Page 15 of the
```

📄 **PX0226-0022 - PX0226-0022**   ⬛

```
        04      document, it has the Bates Stamp L83380 at the
        05      bottom.
```

36. PAGE 53:09 TO 54:04 (RUNNING 00:01:08.700)

```
        09              Q    You'll see a section entitled functional
        10      requirements?
```

CONFIDENTIAL   **page 13**

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```
      11                A     Yes.
      12                Q     Is this a list, to your understanding, of
      13          the requirements that -- the requirements that Blount
      14          had included in its Request for Proposal, and then
      15          the chart next to each requirement indicates whether
      16          Lawson is capable of fulfilling that requirement?
      17                A     Yes.
      18                Q     Okay.  If you turn to page L83406, it's
```

📄 **PX0226-0048 - PX0226-0048**   ▇▇▇▇▇▇

```
      19          Page 41 of the document.  Do you see under the
      20          section requisitioning there is number ten at the
      21          bottom of the page?
      22                A     Yes.
      23                Q     And it states:  Allows users to place
      24          stock, non-stock and non-catalog items from multiple
      25          sources on one requisition?
00054:01                A     Yes.
      02                Q     Was that a functional requirement in the
      03          Request for Proposal that Blount issued to Lawson?
      04                A     Yes.
```

37. PAGE 54:05 TO 54:17 (RUNNING 00:00:45.100)

```
      05                Q     And is that a function that's included in
      06          the software that Lawson provided to Blount?
      07                A     No -- I mean, we don't allow them to go
      08          out to a vendor catalog.  The source is -- they can
      09          order stock and non-stock and put it on the same
      10          requisition, but it all has to come from our Item
      11          Master List or a direct, but they could still put --
      12          or a special, maybe even something that's not in our
      13          Item Master List.  They could still put an inventory
      14          item, a non-stock item that's in the Item Master List
      15          as well as a special item that is not in the Item
      16          Master List all those -- all three could be on one
      17          requisition.
```

38. PAGE 54:18 TO 54:24 (RUNNING 00:00:23.900)

```
      18                Q     So to clarify, a user at Blount using
      19          Lawson's Requisitions Self-Service can create a
      20          requisition for multiple non-stock items that are
      21          generally equivalent yet come from different vendors
      22          and then create -- and create purchase order from
      23          that one requisition?
      24                A     Yes.
```

39. PAGE 56:22 TO 57:21 (RUNNING 00:01:35.000)

```
      22                Q     Can you take a look, please, at Page 51.
```

📄 **PX0226-0058 - PX0226-0058**   ▇▇▇▇▇▇

```
      23          Functional requirement four.
      24                A     Yes.
      25                Q     It says:  Quote, manages price catalogs,
00057:01          purchase orders, purchase order confirmations and
      02          invoice transactions.  Can you describe for me what
```

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```
03          that means, please.
04                 A      That the system has the capability to --
05          to receive or send out electronically purchase orders
06          or receive in invoices through the system.
07                 Q      And does the Requisitions Self-Service
08          system have that functionality?
09                 A      The purchasing -- the purchase order side
10          does.  Not the Requisitions Self-Service side.  The
11          only electronic piece that we use is via the purchase
12          order side, not through Requisitions Self-Service.
13                 Q      So the purchase order module provided by
14          Lawson has that functionality?
15                 A      Yes.  Our -- ours does.  That is --
16          that's what we don't have on Requisitions
17          Self-Service is the ability to go outside of the
18          Lawson system on the RSS side, the Requisitions
19          Self-Service side.  The purchase order side we have
20          the capability to send purchase orders electronically
21          via the GHX interface.
```

40. PAGE 60:13 TO 60:21 (RUNNING 00:00:21.000)

```
13                 Q      Did Ms. Rice provide any additional
14          training beyond that training that you had already
15          discussed?
16                 A      She did work with some of our -- a couple
17          of our information systems employees when a
18          particular gentleman -- to help him understand how to
19          set up the EDI transactions with GHX and who the
20          contact would need to be.
21                        Other than that, I'm not aware of any.
```

41. PAGE 61:09 TO 61:13 (RUNNING 00:00:19.400)

```
09                 Q      You've been handed now Blount Exhibit 5.
```

📄 **PX0228-0001 - PX0228-0001**

```
10          The Bates Numbers on this page which are on the top
11          of the page upside down are B2775 through B2779.
12                        Could you take a moment, please, to look
13          through this series of e-mails.
```

42. PAGE 61:14 TO 61:20 (RUNNING 00:00:21.100)

```
14                        Are you familiar with -- with these
15          series of e-mails here?
16                 A      Yes.
17                 Q      And are these e-mails that were sent from
18          Katrina Rice to you on July 28th and July 29, 2008?
19                 A      Yes.  It looks like some that are
20          attached here also from myself to her.
```

43. PAGE 62:09 TO 64:03 (RUNNING 00:02:10.400)

```
09                 Q      Okay.  Let me ask you this question:
```

📄 **PX0228-0005 - PX0228-0005**

```
10          Were individuals at Blount in the time frame of
11          July 2008 sending Katrina Rice Item Master items to
```

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```
     12        be loaded into the Item Master?
     13             A    Yes.  We would have began working on that
     14        at this time.  Yes.
     15             Q    And how did that process work?  Can you
     16        describe for me the details of --
     17             A    Yes.  We had several spreadsheets that
     18        were very large that were sent -- I think we sent
     19        them all to you, and we would fill out the
     20        spreadsheets based on the criteria of the field, what
     21        it was called, whether they needed the item -- you
     22        know, manufacturer number, our inventory number, the
     23        description, you know, if we got it from a
     24        distributor or if we didn't and setting up the
     25        vendors as well and the codes for the vendors.  We
00063:01        had to set up manufacturer codes.
     02                 That's -- she did refer to manufacturer
     03        codes, and that is an abbreviation for the
     04        manufacturer that had to be set up, and that's what's
     05        tied to the field for the Item Master List, and that
     06        is what she is referring to in there.  And we -- we
     07        gave her the information, and if we missed something
     08        or -- for example, if we attached a manufacturer code
     09        that wasn't in the manufacturer list, it would
     10        generate an error, and she would tell us, hey, this
     11        isn't a valid code because you have to go to a
     12        different table in the system to build the code and
     13        that has to be a valid code built in that table
     14        before you can attach it to an Item Master number.
     15             Q    Okay.  So during this process, she would
     16        work with you to assist you in creating the
     17        spreadsheets that had the information, and then once
     18        those spreadsheets were created, she would load the
     19        information from those spreadsheets into the Item
     20        Master?
     21             A    Yes.  She didn't really help us create
     22        them.  She just basically told us what field she
     23        would need, and she gave us just a blank spreadsheet
     24        with fields labeled at the top and explained to us
     25        what information was required for each field.
00064:01                 It was our job to populate the
     02        spreadsheets and then get them to her, and then she
     03        rolled it into the system.
```

44. PAGE 65:02 TO 65:07 (RUNNING 00:00:28.000)

```
     02             Q    You now have Blount Exhibit 6 with the
```

📄 **PX0229-0001 - PX0229-0001**

```
     03        Bates Stamp, B2766 through B2770.
     04                 This, again, is a series of e-mails from
     05        Katrina Rice to you, and these e-mails are dated
     06        July 31st, 2008 and August 1st, 2008.
     07                 Take a moment, please, to review them.
```

45. PAGE 65:08 TO 66:15 (RUNNING 00:01:31.800)

```
     08                 I want to ask you about the e-mail on the
```

0_W3301

📄 **PX0229-0005 - PX0229-0005**   ████████████

```
09        final page of the document, B2770.  It's an e-mail
10        from Katrina Rice to you dated July 31st, 2008.
11              A     Yes.
12              Q     Do you see here the first sentence of the
13        e-mail says:  Quote, I am working on the Item Master
14        load and have a few issues we will need to go over
15        the week of 8/11.  I have enough loaded for testing,
16        but these issues will need to be resolved before
17        building the next prototype?
18              A     Yes.
19              Q     When she -- when Katrina said to you in
20        this e-mail that she had enough loaded for testing,
21        did that mean to you -- was it your understanding
22        when you received this e-mail that that meant there
23        had been sufficient items loaded into the Item Master
24        by Katrina Rice that there could be tests done on
25        that Item Master?
00066:01        A     Yes.
02              Q     And what kind of tests were -- what kind
03        of tests were run on the Item Master?
04              A     The items were loaded in there, and we
05        were able to go through Requisitions Self-Service
06        through test scenarios and pull items and process for
07        ordering by pulling from that list.
08              Q     And she lists here a series of nine
09        issues that -- Ms. Rice lists a series of nine issues
10        in this e-mail that she was hoping to resolve.
11              Would you and others at Blount work with
12        Ms. Rice to resolve issues that she had in order to
13        populate and build the Item Master so that there
14        wouldn't be any problems with it?
15              A     Yes.
```

46. PAGE 67:02 TO 67:04 (RUNNING 00:00:16.500)

```
02              Q     You now have Blount Exhibit 7, Bates
```

📄 **PX0230-0001 - PX0230-0001**   ████████████

```
03        Stamped B945 through B1051.  Please take a moment to
04        review this document.
```

47. PAGE 67:05 TO 73:16 (RUNNING 00:08:40.200)

```
05              Can you take a look at page B947.  Do you
```

📄 **PX0230-0003 - PX0230-0003**   ████████████

```
06        see the top e-mail on this page is an e-mail from
07        Katrina Rice to C.L. Smith at Blount and also a copy
08        to you?
09              A     You said B00947, correct?
10              Q     That's right.
11              A     Yes.
12              Q     And you see in the first sentence of this
13        e-mail Katrina Rice says -- writes to you:  After
```

0_W3301

```
14          taking out all of the duplicates, attached is the
15          finalized Item Master load and manufacturer code
16          table.
17                   When Ms. Rice wrote that she was
18          attaching the finalized Item Master load and
19          manufacturer code table, what did that mean to you?
20          A       She was letting us know these were the
21          spreadsheets that we had sent her that she had
22          uploaded.
23          Q       And so at that point on November 14th,
24          she was indicating to you she had completed loading
25          into the item master all the spreadsheets you had
00068:01    provided to her?
02          A       That's what I would assume this means.
03          That would be about the time frame I would have
04          suspected.
05          Q       Okay.  And when she refers to the
06          manufacturer code table, is that a spreadsheet that
07          lists particular codes for each manufacturer?
08          A       Yes.  It's just an abbreviation.  The
09          field only takes -- I can't remember -- it's two to
10          four characters, and so you had to come up with an
11          abbreviation for each vendor or manufacturer.
12          Q       And you see in the next paragraph of the
13          e-mail she writes:  I would like to start loading
14          contracts next week if possible.  Remember I will
15          need the vendor item number as well as the item
16          number to load each contract.
17                   Is that referring to what we discussed
18          earlier about how Ms. Rice loaded certain vendor
19          contracts prior to, you know, the Requisitions
20          Self-Service going live on January 1st?
21          A       Yes.  There was -- there was a
22          spreadsheet for contracts, and we got some -- not
23          near as many as we had wanted to -- loaded with her
24          help, and it was just like loading the items or the
25          manufacturer codes.  There was a blank spreadsheet
00069:01    with fields, and we provided her the information
02          requested.
03          Q       Okay.  Take a look at the next -- the
```

📄 **PX0230-0002 - PX0230-0002**

```
04          page before, B9 -- B946.  It's an e-mail from Katrina
05          Rice to Bill Morycz copying you, dated November 18th,
06          2008.
07          A       Yes.
08          Q       Ms. Rice writes:  Quote, I have finished
09          loading the Item Master to the train data area so we
10          have a clean area to train in this week.  It is also
11          loaded with dev, and this is the area we will keep
12          clean to be moved over to the prod.  It is loaded to
13          test but has a lot of bogus data there as that is the
14          area we were training in and doing transactions in
15          to-date.
16                   If possible, could you help me decipher
17          this e-mail and explain what it means?
```

page 18

0_W3301

```
18            A     Yes.  We had three -- the system was kind
19      of loaded in three different sections.  That's
20      probably not the best way to describe it.
21              We had a train version of the system.
22      The same copy of the system was loaded in as
23      development as well as test.  And to keep different
24      pieces of it accurate when we were playing with it
25      and practicing setting up items and doing things like
00070:01      that, we would have functioned and done that in test,
02      and then when we started training our end users, we
03      had have done that through the train version of the
04      system, and then when she's referring to the dev --
05      the d-e-v version of it -- that's kind of the
06      development.  That's where we kept it clean because
07      that was what we were actually going to rollover, and
08      it changed to the prod system.
09            Q     And the prod system is the one you went
10      live with?
11            A     Yes.  That's production, yes.
12            Q     And that's the system that's currently in
13      use?
14            A     Yes.
15            Q     And so Ms. Rice had loaded in as of
16      November 18th, 2008 the Item Master to this dev
17      system which was eventually moved over to the one
18      that went live?
19            A     Yes.
20            Q     Okay.  And if you look at -- take a look
```

📄 **PX0230-0001 - PX0230-0001**   ███████████

```
21      at B945, it's the first e-mail on the chain from
22      Katrina Rice to Rob Storey dated November 18th.
23            A     Yes.
24            Q     Ms. Rice writes in the e-mail:  I am done
25      with Item Master uploads and I have provided it to
00071:01      Cheryl to get back to me with contract pricing.
02              I have loaded the clean data to dev and
03      train so you can have good data to train with as test
04      has all the duplicate items.
05              Does that mean that there was a clean
06      version of Item Master loaded into dev, and that's
07      the one that you went live with?
08            A     Yes.  Yes.  Test was where we had been
09      testing during the times she was still -- we were
10      getting everything finalized and we could have had
11      duplicates or fake items that we had set up just to
12      be able to test with and play with in order to learn
13      the system.
14            Q     And if you look at the last several pages
```

📄 **PX0230-0004 - PX0230-0004**   ███████████

```
15      of this exhibit, it looks like it's a printout of a
16      spreadsheet?
17            A     Yes.
18            Q     Now, is this printout -- to your
```

0_W3301

```
        19          understanding, is this printout a spreadsheet
        20          essentially a list of all the information in the Item
        21          Master that Ms. Rice was attaching to her e-mail?
        22              A    Yes, that's what it appears to be.
        23              Q    Okay.  And so the information in this
        24          spreadsheet had been, you know, collected by Blount
        25          personnel and then it had been loaded in the proper
 00072:01          format by Ms. Rice directly into the Item Master?
        02              A    Correct.
        03          (Blount Deposition Exhibit No. 8 was marked for the
        04          record.)
        05           BY MR. STRAPP:
        06              Q    You now have Blount Exhibit 8, bates
```

📄 **PX0231-0001 - PX0231-0001**

```
        07          number B877 through B879.  Take a moment after you've
        08          had a chance to review it to focus on the e-mail on
```

📄 **PX0231-0003 - PX0231-0003**

```
        09          page B879 from Katrina Rice to you dated
        10          November 20th, 2008.
        11                  Do you see in this e-mail Ms. Rice is
        12          writing to you that Cheryl has given me approximately
        13          110 contracts to load.  And KS fixed up with a
        14          shortcut to the server so I will be working on
        15          getting these loaded.  Cheryl has more contracts to
        16          give me and any lines on the ones that she has given
        17          me that do not load may have to be loaded manually
        18          depending on our time constraints.  And then at the
        19          end of the paragraph, she writes:  I will load as
        20          much as possible today and tomorrow, but I would like
        21          to work with Cheryl the week of December 1st to train
        22          her on the contract loading process and the manual
        23          contract loading process.
        24                  Is it your understanding that Cheryl --
        25          what was Cheryl's last name?
 00073:01              A    Smith.
        02              Q    Is it your understanding that Cheryl
        03          Smith provided Katrina with the vendor contracts and
        04          then Katrina loaded some of those vendor contracts
        05          and trained Cheryl on how to load others?
        06              A    Yes, and the contracts were provided to
        07          her via spreadsheet with the required fields that we
        08          populated the information in the spreadsheet and then
        09          gave it to Katrina, and she loaded the contracts and
        10          attached them to the items.
        11              Q    When you say attached them to the items,
        12          does that mean that the information in the contracts
        13          got associated with the items in the Item Master?
        14              A    Yes.
        15              Q    Information such as price?
        16              A    Yes.
```

48. PAGE 78:06 TO 79:15 (RUNNING 00:01:37.800)

```
        06                  MR. STRAPP:  Blount 11.
```

0_W3301

```
07        (Blount Deposition Exhibit No. 11 was marked for the
08        record.)
09        BY MR. STRAPP:
10             Q      You've been handed now what has been
```

📄 **PX0234-0001 - PX0234-0001**   ⬛

```
11        marked as Blount Exhibit 11.  The Bates Number b817
12        through B827.  This is an e-mail and attachment from
13        Katrina Rice to you dated December 4, 2008.  The
14        subject is Item Master load template.
15             Can you describe for me, please, what --
16        first let me ask you:  Are you familiar with this
17        e-mail and the attachment?
18             A     Yes.
19             Q     And can you describe for me what it is,
20        please.
21             A     It's just simply a guide for us to go by.
22        We can upload mass quantities of items to the Item
23        Master List, the Microsoft add-ins, and these are --
24        she's explaining what the required fields are when we
25        go to do that so that we would not miss anything
00079:01  because there are several places in Lawson, IC11,
02        IC12, IC13, where to have an item set up in the Item
03        Master List correctly you have to populate each of
04        those fields under those screens, and she was telling
05        us which fields were required in order to do that
06        through Microsoft add-ins.
07             Q     And this information she was providing to
08        you was information that you would use to add items
09        to the Item Master after it went live January of
10        2009?
11             A     Yes.
12             Q     Before it went live, she was the
13        individual who actually added the items to the Item
14        Master, correct?
15             A     That is correct.
```

49. PAGE 79:20 TO 80:10 (RUNNING 00:00:49.500)

```
20             Q     Can you describe for me how Microsoft
21        add-ins are used to populate the Item Master?
22             A     We haven't been using it.  We need to,
23        but we haven't been using it.  So I really can't tell
24        you anything about it.  I would have to go back
25        through all of my notes to even begin to do it.  We
00080:01  just haven't done it.
02             Everything we've added we've done it in a
03        manual situation one item at a time up to this point.
04             Q     Do you -- does Blount use this Item
05        Master upload template provided by Ms. Rice from
06        Lawson when it adds information into the Item Master?
07             A     No, not up to this point we have not.
08        She just provided it, and we should have, but we
09        haven't because we haven't done any mass uploads.
10        It's all been individual items.
```

0_W3301

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50. PAGE 82:07 TO 82:18 (RUNNING 00:00:29.900)

```
07              Q     When -- when a contract is entered from a
08       vendor into the system, does the cost associated with
09       the particular item from the vendor automatically get
10       pulled into the Item Master?
11              A     Yes.  If a contract is tied to that
12       particular item, yes, it will.  If there is no
13       contract tied to the item, the system pulls it from
14       the last price paid.
15              Q     And where does -- how does the system
16       pull in the last price paid?  Where does that come
17       from?  Does that come from the purchasing module?
18              A     Yes.
```

51. PAGE 87:02 TO 88:03 (RUNNING 00:01:12.400)

```
02       (Blount Deposition Exhibit No. 14 was marked for the
03       record.)
04        BY MR. STRAPP:
05              Q     Okay.  You now have in front of Blount
```

📄 **PX0237-0001 - PX0237-0001**   ▮▮▮▮▮▮▮▮▮▮

```
06       Exhibit 14.  Are you familiar with this document?
07              A     Yes.
08              Q     What is this document?
09              A     It was a test script that Katrina showed
10       the Super Users as we learned to do Requisitions
11       Self-Service.
12              Q     Okay.  So this is a script prepared by
13       Lawson on -- on using Requisitions Self-Service, and
14       Ms. Rice trained you and the other Super Users at
15       Blount on how to train you and the other users at
16       Blount on how to use this script?
17              A     Yes.
18              Q     And specifically what is this script --
19       what -- what is this script created for?
20              A     It's to walk you through when you log-in
21       Requisitions Self-Service the different fields that
22       are required and what you need to -- or if they are
23       not required or what needs to be put in them and the
24       different tabs that you can go in to search different
25       ways through Requisitions Self-Service.
00088:01              It kind of walks you through setting up a
02       requisition and the different tabs and the functions
03       of those tabs on that requisition.
```

52. PAGE 88:20 TO 89:17 (RUNNING 00:00:55.100)

```
20              Q     Okay.  Did the version and training
21       provided to the other users encompass the
22       functionality that they needed to use Requisitions
23       Self-Service as a shopping function?
24              A     Yes.
25              Q     And it also included training on how to
00089:01       use the search functionality?
02              A     Yes.
03              Q     And it also created training -- it
```

0_W3301

```
04        included training on how to create requisitions?
05               A      Yes.
06               Q      And how to approve requisitions?
07               A      We actually handled that in a different
08        class with our supervisors and stuff, or we -- we
09        touched -- I think there actually may have been a
10        page at the back of Blount Exhibit 2 that went
11        through how to approve something because we would
12        have a mix of people in our classes, and some were
13        people that were supervisors or department heads that
14        would have to go in and approve requisitions.
15                      So we explained that to them at the end
16        of the class if they were somebody that approved it,
17        where to go and how to get that.
```

53. PAGE 89:18 TO 90:17 (RUNNING 00:01:07.500)

```
18        (Blount Deposition Exhibit No. 15 was marked for the
19        record.)
20         BY MR. STRAPP:
21               Q      You now have Blount Exhibit 15, and this
```

📄 **PX0238-0001 - PX0238-0001**

```
22        has Bates Stamp B3020 through B3031.  Please take a
23        moment to review the document.
24                      Is this a document that you're familiar
25        with?
00090:01         A      I have seen this document, yes.
02               Q      And can you describe to me what it is,
03        please.
04               A      It's just basically an overview diagram
05        of -- kind of from the starting of the implementation
06        in how to set up the items and kind of the flow of
07        data through Lawson.  It's kind of just an overview
08        of that.
09               Q      Is this a document that was prepared by
10        Katrina Rice from Lawson?
11               A      Yes.  Well, or somebody at Lawson.  I'm
12        not sure it was prepared by her or someone at Lawson.
13               Q      Did Ms. Rice present this document or
14        this presentation to you?
15               A      Yes.  If I remember correctly, it was
16        e-mailed to us just to try to help us understand how
17        data flowed through the system.
```

54. PAGE 90:22 TO 91:04 (RUNNING 00:00:27.000)

```
22               Q      Okay.  Do you see on page B320 -- 3021,
```

📄 **PX0238-0002 - PX0238-0002**

```
23        the second page of the document, there is a slide
24        that's entitled process diagram for Item Master set
25        up.
00091:01         A      Yes.
02               Q      And there are steps here for process flow
03        on how to set up the Item Master, correct?
04               A      Yes.
```

0_W3301

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55. PAGE 91:19 TO 92:25 (RUNNING 00:01:37.000)

```
        19              Q      You now have in front of you Blount
```

📄 **PX0239-0001 - PX0239-0001**   ████████████

```
        20      Exhibit 16, Bates Numbered B2243 through B2253.
        21              This is an e-mail and attachment from
        22      Katrina Rice to Rob Storey copying you, dated
        23      September 10th, 2008, and it attaches something
        24      called a process flow functional specification.
        25              Can you describe for me -- first of all,
00092:01      are you familiar with document?
        02              A      I don't remember this one.  I mean, I'm
        03      sure I looked at it, but I don't remember it.
        04              Q      Do you know what a process flow means
        05      here?
        06              A      Yes.
        07              Q      And what is that?
        08              A      Process flow is how the system -- it
        09      flows for approval.  It's how you know -- for
        10      example, if Rob, who works for me, puts in a
        11      requisition and it's over $1,000, it's going to come
        12      to me for approval.  If my approval limit is $2,500,
        13      if his requisition was for 5, I'm going to approve
        14      it, and then it's going to go on to my supervisor,
        15      John Hanks, for his approval.
        16              Process flow allows you to set those
        17      different dollar approval levels up and routes the
        18      requisition based on your department, who your
        19      supervisor is, and then we also have process flows
        20      set up for capital whether it being an approved
        21      capital budgeted item or an emergency capital.  Those
        22      are unique process flows depending on -- it looks at
        23      the account number and activity code and routes based
        24      on those things.  That's what process flow does is
        25      routes it to the correct places for approval.
```

56. PAGE 133:16 TO 134:09 (RUNNING 00:00:40.100)

```
        16              You mentioned that you do not license
        17      Punchout; is that correct?
        18              A      Yes.
        19              Q      Were you offered Punchout?
        20              A      Yes.
        21              Q      And why didn't you license Punchout?
        22              A      Because we tried to control costs, and I
        23      think that opens requisitioners to be able to go out
        24      and look at items that we may not have under contract
        25      price that we may not have the -- the MDS sheets on,
00134:01      various reasons.  We like to control the products
        02      that are being brought in from a safety standpoint as
        03      well as a cost standpoint.
        04              Q      I believe you said earlier you didn't
        05      want them to have access to vendor catalogs?
        06              A      Absolutely.
        07              Q      So the system as it stands now does not
        08      give users access to the catalog?
```

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0_W3301

```
     09            A     No.
```

57. PAGE 135:25 TO 136:12 (RUNNING 00:00:34.300)

```
     25            Q     You were just asked by Mr. Graham about
00136:01      vendor catalogs.  Do you recall that in the context
     02       of procurement Punchout?
     03            A     Yes.     catalog
     04            Q     Vendor chat log information would include
     05       information about products that the vendor has in
     06       stock, correct?
     07            A     Yes.
     08            Q     And the vendor catalog information is
     09       included in the Item Master to the extent that you
     10       carry items from a particular vendor, correct?
     11            A     It might not be all of their catalog,
     12       but, yes, the pieces that we use, yes.
```

> **TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:57:13.200)**

CONFIDENTIAL   **page 25**